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9

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY) CASE NO. 157 688
13 INTERNATIONAL, a California not-)
for-profit religious corporation;) PLAINTIFF'S SEPARATE
14 Plaintiff,) STATEMENT OF DOCUMENT
15) PRODUCTION REQUESTS AT
vs.) ISSUE
16) [FILED CONCURRENTLY WITH
GERALD ARMSTRONG; MICHAEL WALTON;) PLAINTIFF'S MOTION TO
17 THE GERALD ARMSTRONG CORPORATION,) COMPEL PRODUCTION OF
a California for-profit) DOCUMENTS FROM DEFENDANT
18 corporation; Does 1 through 100,) THE GERALD ARMSTRONG
inclusive,) CORPORATION, FILED UNDER
19) SEPARATE COVER]
Defendants.)
20)

21 **SEPARATE STATEMENT CONTAINING REQUESTS FOR THE PRODUCTION OF**
22 **DOCUMENTS BY DEFENDANT THE GERALD ARMSTRONG CORPORATION**

23 **(Plaintiff's First Request for Production of Documents)**

24 Pursuant to Law and Discovery Manual § 251 et seq.,
25 plaintiff Church of Scientology International hereby presents its
26 Separate Statement in support of its concurrently filed motion to
27 compel production of documents in response to Plaintiff's First
28

1 Request for the Production of Documents by Defendant the Gerald
2 Armstrong Corporation.

3 **REQUEST FOR PRODUCTION No. 1:**

4 Request for Production 1:

5 All documents relating to the passing of title or conveyance
6 of the property known as 707 Fawn Drive, San Anselmo, California,
7 and more particularly described as follows:

8 **PARCEL ONE**

9 PARCEL TWO as shown upon that certain Parcel Map entitled,
10 "Parcel Map Lands of California Land Title Portion Lands
11 described in book 2887 of Official Records, at page 367,
12 also being Portion of Lots 501 and 501-A unrecorded Map of
Sleepy Hollow Acres, Vicinity of San Anselmo, Marin County,
California, filed for record April 8, 1976 in Volume 12 of
Parcel Maps, at page 43, Marin County Records.

13 EXCEPTING THEREFROM that portion deeded to Alain Pigois and
14 Nina Pigoism husband and wife, as community property, by
Deed recorded February 27, 1989, Serial No. 89 13373.

15 **PARCEL TWO**

16 **AN EASEMENT** for ingress, egress and public utility purpose
17 described as follows:

18 BEGINNING at a point on the centerline of Fawn Drive, said
19 point being the most southwesterly corner of Parcel 3, as
20 shown upon that certain map entitled, "Parcel Map Lands of
21 California Land Title Portion page 367, also being a portion
22 of Lots 501 and 501-A, unrecorded Map of Sleepy Hollow
23 Acres, Vicinity of San Anselmo, Marin County, California,"
24 filed for record April 9, 1976 in Volume 12 of Parcel Maps,
25 at page 43, Marin County Records, said point also being the
26 intersection of the calls "South 26 degrees 20' East 135
27 feet and North 63 degrees 40' East 20 feet" as contained in
28 Parcel 2 of the Deed executed by California Land Title
Company, a corporation to Michael C. McGuckin, et ux,
recorded March 26, 1976 in Book 3010 of Official Records, at
page 190, Marin County Records; thence from said point of
beginning and along the exterior boundary of said Parcel 3,
North 63 degrees 40' East 20 feet; thence North 75 degrees
07' 20" East 164.00 feet; thence leaving said exterior
boundary of Parcel 3, North 12 degrees 41' East 85.00 feet;
thence North 30 degrees 45' West 126.00 feet, thence North
13 degrees 30' East 79.21 feet to the northwesterly boundary
of Parcel 1, as shown upon that certain map referred to
hereinabove; then along the exterior boundary of said Parcel

1 1, South 84 degrees 00' west 75.70 feet to the most
2 Northerly corner of the parcel of land described in the Deed
3 executed by Charles B. Robertson, et ux, to Paul Hopkins,
4 Jr., et ux, recorded page 623, Marin County Records; then
5 111.7 feet, thence leaving said exterior boundary of Parcel
6 1, South 18 degrees 45' East 95.06 feet thence South 21
7 degrees 48' West 70.66 feet; thence South 75 degrees 07' 20"
8 West 160.00 feet to the certline of Fawn Drive; thence along
9 the exterior boundary of said Parcel 3, also being the
10 centerline of "Fawn Drive, South 26 degrees 20' East 34.46
11 feet to the point of the beginning.

12 (the "PROPERTY"), from the date of acquisition to the present,
13 including all documents relating to the acquisition of the
14 PROPERTY.

15 Response to Request for Production No. 1:

16 Armstrong Corporation objects on the following grounds: that
17 the request violates the right to privacy and the right to
18 freedom of religion, speech, press and association, that the
19 request is not calculated to lead to the discovery of admissible
20 evidence, and is irrelevant, constitutes discovery prohibited by
21 the order of the Superior Court of Los Angeles, and is ambiguous,
22 overbroad, vague, burdensome and harassive.

23 Reasons Why Production of Documents is Necessary:

24 The Church has requested that The Gerald Armstrong
25 Corporation ("Armstrong Corporation") produce documents which
26 relate to the ownership and transfer of assets by defendant
27 Gerald Armstrong to his co-defendants. It is difficult to
28 imagine material which is more relevant to a fraudulent
conveyance action, or more likely to lead to the discovery of
admissible evidence.

C.C.P. § 2017(a) provides that a party may obtain discovery

[R]egarding any matter, not privileged, that is
relevant to the subject matter involved in the pending
action... if the matter either is itself calculated to

1 lead to the discovery of admissible evidence. Discovery
2 may relate to the claim or defense of the party seeking
discovery or any other party to the action.

3 The discovery provisions are interpreted liberally, with all
4 doubt resolved in favor of permitting discovery. Colonial Life &
5 Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183
6 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,
7 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36
8 Cal.3d 291, 204 Cal.Rptr. 154.

9 During meet and confer, the Church asked that counsel for
10 Armstrong Corporation identify what he considered to be vague or
11 unclear about this request, and what about the request
12 represented an undue burden. Mr. Greene did not respond so the
13 Church is left to wonder what it is about these clear,
14 specifically drawn requests that the Armstrong Corporation and
15 its counsel do not understand. This request asks for documents
16 concerning the transfer of assets from defendant Gerald Armstrong
17 to or for defendant Armstrong Corporation. This is not a
18 "burdensome" request when made in the context of fraudulent
19 conveyance litigation.

20 Armstrong Corporation does not identify whose "right to
21 privacy" is allegedly violated by this request. Assuming arguendo
22 that Armstrong Corporation is attempting to assert its own
23 privacy interests, "the constitutional provision governing rights
24 to privacy does not apply to corporations, but rather, protects
25 privacy rights of people." Roberts v. Gulf Oil Corporation (1983)
26 147 Cal.App.3d 770, 195 Cal.Rptr. 393, 395, 408.

27 Additionally, the objection is simply irrelevant to this
28 request. The Church seeks documents relating to the transfer of

1 assets by defendant Gerald Armstrong and his co-defendants: the
2 very subject matter of this litigation. The courts must balance
3 the privacy rights of persons subject to discovery against the
4 right of civil litigants to discover relevant facts and the
5 public interest in litigation. Vinson v. Superior Court (1987) 43
6 Cal.3d 833, 842, 239 Cal.Rptr. 292, 299; Valley Bank v. Superior
7 Court (1975) 15 Cal.3d 652, 125 Cal.Rptr. 553, 555. Even very
8 personal and confidential information may have to be disclosed if
9 "essential to a fair determination of the lawsuit." Morales v.
10 Superior Court (1979) 99 Cal.App.3d 283, 160 Cal.Rptr. 194.

11 Armstrong Corporation has claimed that this request somehow
12 violates rights to "freedom of religion, speech, press and
13 association" but offers no explanation of whose rights these are.
14 It is incomprehensible that a privately owned, for-profit
15 corporation would claim these rights on its own behalf, and the
16 Church has been unable to find any authority supporting this
17 position. Further, Armstrong Corporation has offered no
18 explanation as to how the Church's reasonable requests for
19 documents relating to its assets could possibly violate any of
20 its First Amendment rights. This action is directed at defendant
21 Gerald Armstrong's conveyance of assets so as to essentially
22 render himself judgment proof, while at the same time engaging in
23 what he admits (and in fact boasts of) were breaches of the
24 December, 1986 settlement agreement with the Church. The Church
25 has been unable to find any authority which even remotely
26 suggests that Armstrong Corporation may refuse to produce
27 documents relative to its assets in a fraudulent conveyance
28 action by claiming that such production would somehow violate

1 its rights to freely practice its religion or associate with
2 persons of its choice. The Church's request that Armstrong
3 Corporation supply such authority, if any exists, was met with
4 silence. [Ex. C to Declaration of Andrew Wilson.]

5 Finally, no order exists prohibiting discovery in this
6 action. This Court has already denied not one, but two, attempts
7 by Armstrong to stay discovery herein. [Ex. E to Declaration of
8 Andrew Wilson.] The cases pending in Los Angeles are, indeed,
9 stayed while the Court of Appeal considers Armstrong's appeal of
10 the preliminary injunction which that Court granted to the
11 Church. Discovery there, however, has nothing to do with
12 discovery here. Nothing in any order of the Los Angeles court
13 can reasonably be construed to prohibit, stay or interfere with
14 discovery here; at most, the stay in those cases has put
15 discovery therein on hold.

16 **REQUEST FOR PRODUCTION No. 2:**

17 Request for Production No. 2:

18 All documents evidencing or relating to the state of title
19 of the PROPERTY or any portion thereof, any estate therein.

20 Response to Request For Production No. 2:

21 Armstrong Corporation objects on the following grounds: that
22 the request violates the right to privacy and the right to
23 freedom of religion, speech, press and association, that the
24 request is not calculated to lead to the discovery of admissible
25 evidence, and is irrelevant, constitutes discovery prohibited by
26 the order of the Superior Court of Los Angeles, and is ambiguous,
27 overbroad, vague, burdensome and harassive.

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1 Reasons Why Production of Documents Is Necessary:

2 See argument regarding Request No. 1, above.

3 **REQUEST FOR PRODUCTION No. 3:**

4 Request for Production No. 3:

5 All documents comprising, evidencing or relating to any
6 agreement between you and/or Gerald Armstrong and/or Michael
7 Walton relating to the PROPERTY including, but not limited to,
8 agreements of co-ownership and respective amounts of contribution
9 towards down payment and mortgage payments.

10 Response to Request for Production No. 3:

11 Armstrong Corporation objects on the following grounds: that
12 the request violates the right to privacy and the right to
13 freedom of religion, speech, press and association, that the
14 request is not calculated to lead to the discovery of admissible
15 evidence, and is irrelevant, constitutes discovery prohibited by
16 the order of the Superior Court of Los Angeles, and is ambiguous,
17 overbroad, vague, burdensome and harassive.

18 Reasons Why Production of Documents is Necessary:

19 See argument regarding Request No. 1, above.

20 **REQUEST FOR PRODUCTION No. 4:**

21 Request for Production No. 4:

22 All documents comprising, evidencing or relating to property
23 tax bills or property tax statements for the PROPERTY that have
24 been incurred or received at any time from December 1986 until
25 the present.

26 Response to Request for Production No. 4:

27 Armstrong Corporation objects on the following grounds: that
28 the request violates the right to privacy and the right to

1 freedom of religion, speech, press and association, that the
2 request is not calculated to lead to the discovery of admissible
3 evidence, and is irrelevant, constitutes discovery prohibited by
4 the order of the Superior Court of Los Angeles, and is ambiguous,
5 overbroad, vague, burdensome and harassive.

6 Reasons Why Production of Documents is Necessary:

7 See argument regarding Request No. 1, above.

8 **REQUEST FOR PRODUCTION No. 5:**

9 Request for Production No. 5:

10 All documents comprising or relating to payments made,
11 including checks or money orders or other documentation of
12 payments made on the aforementioned property tax bills.

13 Response to Request for Production No. 5:

14 Armstrong Corporation objects on the following grounds: that
15 the request violates the right to privacy and the right to
16 freedom of religion, speech, press and association, that the
17 request is not calculated to lead to the discovery of admissible
18 evidence, and is irrelevant, constitutes discovery prohibited by
19 the order of the Superior Court of Los Angeles, and is ambiguous,
20 overbroad, vague, burdensome and harassive.

21 Reasons Why Production of Documents is Necessary:

22 See argument regarding Request No. 1, above.

23 **REQUEST FOR PRODUCTION No. 6:**

24 Request for Production No. 6:

25 All documents comprising or relating to any agreement
26 concerning liens, easements, rights of way, mineral rights, water
27 rights, leaseholds or any other interest in the PROPERTY.

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1 Response to Request for Production No. 6:

2 Armstrong Corporation objects on the following grounds: that
3 the request violates the right to privacy and the right to
4 freedom of religion, speech, press and association, that the
5 request is not calculated to lead to the discovery of admissible
6 evidence, and is irrelevant, constitutes discovery prohibited by
7 the order of the Superior Court of Los Angeles, and is ambiguous,
8 overbroad, vague, burdensome and harassive.

9 Reasons Why Production of Documents is Necessary:

10 See argument regarding Request No. 1, above.

11 **REQUEST FOR PRODUCTION No. 7:**

12 Request for Production No. 7:

13 All documents evidencing, comprising or relating to any
14 liens, encumbrances, foreclosure actions, whether pending or not,
15 on the PROPERTY including but not limited to, documents relating
16 to any payment or partial payment toward any such liens,
17 foreclosure actions or other encumbrance.

18 Response to Request for Production No. 7:

19 Armstrong Corporation objects on the following grounds: that
20 the request violates the right to privacy and the right to
21 freedom of religion, speech, press and association, that the
22 request is not calculated to lead to the discovery of admissible
23 evidence, and is irrelevant, constitutes discovery prohibited by
24 the order of the Superior Court of Los Angeles, and is ambiguous,
25 overbroad, vague, burdensome and harassive.

26 Reasons Why Production of Documents is Necessary:

27 See argument regarding Request No. 1, above.

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REQUEST FOR PRODUCTION No. 8:

Request for Production No. 8:

All documents, including loan applications, relating to any loans secured by the PROPERTY at any time from the acquisition of the PROPERTY by you to the present whether or not said loan(s) is/are repaid. If said loan(s) is/are repaid, even if you were not the entity who repaid it, please provide all documents relating to said repayment.

Response to Request for Production No. 8:

Armstrong Corporation objects on the following grounds: that the request violates the right to privacy and the right to freedom of religion, speech, press and association, that the request is not calculated to lead to the discovery of admissible evidence, and is irrelevant, constitutes discovery prohibited by the order of the Superior Court of Los Angeles, and is ambiguous, overbroad, vague, burdensome and harassive.

Reasons Why Production of Documents is Necessary:

See argument regarding Request No. 1, above.

REQUEST FOR PRODUCTION No. 9:

Request for Production No. 9:

All documents comprising, evidencing or relating to payment made or other exchange applied for any transfer of title on the PROPERTY from 1986 until the present. This is to include, but not be limited to, canceled checks or receipts.

Response to Request for Production No. 9:

Armstrong Corporation objects on the following grounds: that the request violates the right to privacy and the right to freedom of religion, speech, press and association, that the

1 request is not calculated to lead to the discovery of admissible
2 evidence, and is irrelevant, constitutes discovery prohibited by
3 the order of the Superior Court of Los Angeles, and is ambiguous,
4 overbroad, vague, burdensome and harassing.

5 Reasons Why Production of Documents is Necessary:

6 See argument regarding Request No. 1, above.

7 **REQUEST FOR PRODUCTION No. 10:**

8 Request for Production No. 10:

9 All documents comprising, evidencing or reflecting bills or
10 invoices, and payments thereon, of maintenance of the PROPERTY
11 from the acquisition of any portion of the PROPERTY by you,
12 Gerald Armstrong or Michael Walton to the present.

13 Response to Request for Production No. 10:

14 Armstrong Corporation objects on the following grounds: that
15 the request violates the right to privacy and the right to
16 freedom of religion, speech, press and association, that the
17 request is not calculated to lead to the discovery of admissible
18 evidence, and is irrelevant, constitutes discovery prohibited by
19 the order of the Superior Court of Los Angeles, and is ambiguous,
20 overbroad, vague, burdensome and harassing.

21 Reasons Why Production of Documents is Necessary:

22 See argument regarding Request No. 1, above.

23 **REQUEST FOR PRODUCTION OF DOCUMENTS No. 11**

24 Request For Production No. 11:

25 All documents comprising, evidencing or relating to bills or
26 invoices, contracts, oral or written, and payments thereon of
27 subcontractors, materialmen, suppliers or other individuals or
28 business entities who provided labor, material or supplies for

1 the modification of the PROPERTY at any time from the acquisition
2 by you, Gerald Armstrong or Michael Walton of any portion of the
3 PROPERTY to the present.

4 Response to Request No. 11:

5 Armstrong Corporation objects on the following grounds: that
6 the request violates the right to privacy and the right to
7 freedom of religion, speech, press and association, that the
8 request is not calculated to lead to the discovery of admissible
9 evidence, and is irrelevant, constitutes discovery prohibited by
10 the order of the Superior Court of Los Angeles, and is ambiguous,
11 overbroad, vague, burdensome and harassive.

12 Reasons Why Production of Documents Is Necessary:

13 See argument regarding Request No. 1, above.

14 Request For Production No. 12:

15 All documents comprising, evidencing or relating to payments
16 to any utility companies for the utilities at the PROPERTY at any
17 time from the acquisition by you, Gerald Armstrong or Michael
18 Walton of any portion of the PROPERTY to the present.

19 Response to Request No. 12:

20 Armstrong Corporation objects on the following grounds: that
21 the request violates the right to privacy and the right to
22 freedom of religion, speech, press and association, that the
23 request is not calculated to lead to the discovery of admissible
24 evidence, and is irrelevant, constitutes discovery prohibited by
25 the order of the Superior Court of Los Angeles, and is ambiguous,
26 overbroad, vague, burdensome and harassive.

27 Reasons Why Production of Documents Is Necessary:

28 See argument regarding Request No. 1, above.

1 Request For Production No. 13:

2 All documents reflecting the names, addresses and telephone
3 numbers of all accountants, accounting firms and other persons or
4 businesses that you retained to manage, analyze, monitor or keep
5 records of your business and financial affairs and assets, from
6 January 1, 1987 to the present.

7 Response to Request No. 13:

8 Armstrong Corporation objects on the following grounds: that
9 the request violates the right to privacy and the right to
10 freedom of religion, speech, press and association, that the
11 request is not calculated to lead to the discovery of admissible
12 evidence, and is irrelevant, constitutes discovery prohibited by
13 the order of the Superior Court of Los Angeles, and is ambiguous,
14 overbroad, vague, burdensome and harassive.

15 Reasons Why Production of Documents Is Necessary:

16 See argument regarding Request No. 1, above.

17 Request For Production No. 14:

18 All documents reflecting your financial condition. Such
19 documents shall include but not be limited to financial
20 statements, profit and loss statements, income and expense
21 statements, asset statements, balance sheets and local
22 applications.

23 Response to Request No. 14:

24 Armstrong Corporation objects on the following grounds: that
25 the request violates the right to privacy and the right to
26 freedom of religion, speech, press and association, that the
27 request is not calculated to lead to the discovery of admissible
28 evidence, and is irrelevant, constitutes discovery prohibited by

1 the order of the Superior Court of Los Angeles, and is ambiguous,
2 overbroad, vague, burdensome and harassive.

3 Reasons Why Production of Documents Is Necessary:

4 See argument regarding Request No. 1, above.

5 Request For Production No. 15:

6 All documents reflecting the names, addresses and telephone
7 numbers of the locations at which all your business, personal and
8 banking accounts, including those of the Gerald Armstrong
9 Corporation, are maintained.

10 Response to Request No. 15:

11 Armstrong Corporation objects on the following grounds: that
12 the request violates the right to privacy and the right to
13 freedom of religion, speech, press and association, that the
14 request is not calculated to lead to the discovery of admissible
15 evidence, and is irrelevant, constitutes discovery prohibited by
16 the order of the Superior Court of Los Angeles, and is ambiguous,
17 overbroad, vague, burdensome and harassive.

18 Reasons Why Production of Documents Is Necessary:

19 See argument regarding Request No. 1, above.

20 Request For Production No. 16:

21 All documents which refer to, relate to, mention, discuss,
22 concern or evidence, without limitation, any stock offering made
23 by you from January 1, 1987 until the present.

24 Response to Request No. 16:

25 Armstrong Corporation objects on the following grounds: that
26 the request violates the right to privacy and the right to
27 freedom of religion, speech, press and association, that the
28 request is not calculated to lead to the discovery of admissible

1 evidence, and is irrelevant, constitutes discovery prohibited by
2 the order of the Superior Court of Los Angeles, and is ambiguous,
3 overbroad, vague, burdensome and harassive.

4 Reasons Why Production of Documents Is Necessary:

5 See argument regarding Request No. 1, above.

6 Request For Production No. 17:

7 All documents which refer to, relate to, mention, discuss,
8 concern or evidence, without limitation, any transfer of shares
9 in GAC made by anyone from January 1, 1987 until the present.

10 Response to Request No. 17:

11 Armstrong Corporation objects on the following grounds: that
12 the request violates the right to privacy and the right to
13 freedom of religion, speech, press and association, that the
14 request is not calculated to lead to the discovery of admissible
15 evidence, and is irrelevant, constitutes discovery prohibited by
16 the order of the Superior Court of Los Angeles, and is ambiguous,
17 overbroad, vague, burdensome and harassive.

18 Reasons Why Production of Documents Is Necessary:

19 See argument regarding Request No. 1, above.

20 Request For Production No. 18:

21 All documents which refer to, relate to, mention, discuss,
22 concern or evidence, without limitation, any transfer of assets
23 from Gerald Armstrong to you from January 1, 1987 until the
24 present.

25 Response to Request No. 18:

26 Armstrong Corporation objects on the following grounds: that
27 the request violates the right to privacy and the right to
28 freedom of religion, speech, press and association, that the

1 request is not calculated to lead to the discovery of admissible
2 evidence, and is irrelevant, constitutes discovery prohibited by
3 the order of the Superior Court of Los Angeles, and is ambiguous,
4 overbroad, vague, burdensome and harassive.

5 Reasons Why Production of Documents Is Necessary:

6 See argument regarding Request No. 1, above.

7 Request For Production No. 19:

8 All documents which refer to, relate to, mention, discuss,
9 concern or evidence, without limitation, any loans made to by any
10 person from January 1, 1987 until the present.

11 Response to Request No. 19:

12 Armstrong Corporation objects on the following grounds: that
13 the request violates the right to privacy and the right to
14 freedom of religion, speech, press and association, that the
15 request is not calculated to lead to the discovery of admissible
16 evidence, and is irrelevant, constitutes discovery prohibited by
17 the order of the Superior Court of Los Angeles, and is ambiguous,
18 overbroad, vague, burdensome and harassive.

19 Reasons Why Production of Documents Is Necessary:

20 See argument regarding Request No. 1, above.

21 Request For Production No. 20:

22 All documents reflecting the names and titles of all
23 employees who worked for you from January 1, 1987 to the present.

24 Response to Request No. 20:

25 Armstrong Corporation objects on the following grounds: that
26 the request violates the right to privacy and the right to
27 freedom of religion, speech, press and association, that the
28 request is not calculated to lead to the discovery of admissible

1 evidence, and is irrelevant, constitutes discovery prohibited by
2 the order of the Superior Court of Los Angeles, and is ambiguous,
3 overbroad, vague, burdensome and harassive.

4 Reasons Why Production of Documents Is Necessary:

5 See argument regarding Request No. 1, above.

6 Request For Production No. 21:

7 All documents which refer to, relate to, mention, discuss,
8 concern or evidence, without limitation, any payments made to you
9 by Gerald Armstrong from January 1, 1987 until the present.

10 Response to Request No. 21:

11 Armstrong Corporation objects on the following grounds: that
12 the request violates the right to privacy and the right to
13 freedom of religion, speech, press and association, that the
14 request is not calculated to lead to the discovery of admissible
15 evidence, and is irrelevant, constitutes discovery prohibited by
16 the order of the Superior Court of Los Angeles, and is ambiguous,
17 overbroad, vague, burdensome and harassive.

18 Reasons Why Production of Documents Is Necessary:

19 See argument regarding Request No. 1, above.

20 Request For Production No. 22:

21 All documents which refer to, relate to, mention, discuss,
22 concern or evidence, without limitation, any payments made by you
23 to Michael Walton from January 1, 1987 until the present.

24 Response to Request No. 22:

25 Armstrong Corporation objects on the following grounds: that
26 the request violates the right to privacy and the right to
27 freedom of religion, speech, press and association, that the
28 request is not calculated to lead to the discovery of admissible

1 evidence, and is irrelevant, constitutes discovery prohibited by
2 the order of the Superior Court of Los Angeles, and is ambiguous,
3 overbroad, vague, burdensome and harassive.

4 Reasons Why Production of Documents Is Necessary:

5 See argument regarding Request No. 1, above.

6 Request For Production No. 23:

7 All documents which refer to, relate to, mention, discuss,
8 concern or evidence, without limitation, any property, cash or
9 other asset paid by you, of any kind whatsoever, in exchange for
10 every transfer of cash and/or shares of stock in the Gerald
11 Armstrong Corporation made to you by Gerald Armstrong.

12 Response to Request No. 23:

13 Armstrong Corporation objects on the following grounds: that
14 the request violates the right to privacy and the right to
15 freedom of religion, speech, press and association, that the
16 request is not calculated to lead to the discovery of admissible
17 evidence, and is irrelevant, constitutes discovery prohibited by
18 the order of the Superior Court of Los Angeles, and is ambiguous,
19 overbroad, vague, burdensome and harassive.

20 Reasons Why Production of Documents Is Necessary:

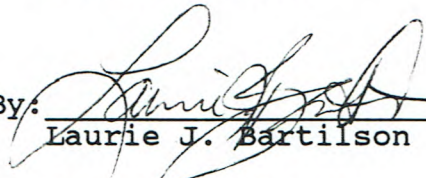
21 See argument regarding Request No. 1, above.

22 Dated: November 30, 1993

BOWLES & MOXON

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By: 
Laurie J. Bartilson

25

26

Andrew H. Wilson
WILSON, RYAN & CAMPILONGO

27

Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On November 30, 1993, I served the foregoing document described as PLAINTIFF'S SEPARATE STATEMENT OF DOCUMENT PRODUCTION REQUESTS AT ISSUE on interested parties in this action,

by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

by placing the original true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
HUB Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

MICHAEL WALTON
707 Fawn Drive
San Anselmo, CA 94960

BY MAIL

*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on November 30, 1993 at Los Angeles, California.

*(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

[]** Such envelopes were hand delivered by
Messenger Service

Executed on _____, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of
the State of California that the above is true and
correct.

[] (Federal) I declare that I am employed in the
office of a member of the bar of this court at
whose direction the service was made.

Graabriel Becket
Print or Type Name

Graabriel Becket
Signature

* (By Mail, signature must be of person depositing
envelope in mail slot, box or bag)

** (For personal service signature must be that of
messenger)